

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

---

**THE CHESTER COUNTY HOSPITAL**

**v.**

**INDEPENDENCE BLUE CROSS,  
QCC INSURANCE COMPANY,  
KEYSTONE HEALTHPLAN EAST, and  
KEYSTONE MERCY HEALTH PLAN**

---

**NO. 02-CV-2746**

**EXHIBIT "A"**

**TO**

**NON-PARTY AETNA INC.'S MEMORANDUM IN SUPPORT OF ITS OPPOSITION  
TO IBC'S MOTION FOR CONTEMPT**

DUANE MORRIS

FIRM and AFFILIATE OFFICES

LEWIS R. OLSHIN  
DIRECT DIAL: 215.979.1129  
E-MAIL: [Olshin@duanemorris.com](mailto:Olshin@duanemorris.com)

[www.duanemorris.com](http://www.duanemorris.com)

May 22, 2003

**Via Federal Express**

James C. Crumlish, Esquire  
Elliott Reihner Siedzikowski Egan, P.C.  
Union Meeting Corporate Center V  
P.O. Box 3010  
925 Harvest Drive  
Blue Bell, PA 19422

NEW YORK  
LONDON  
CHICAGO  
HOUSTON  
PHILADELPHIA  
SAN FRANCISCO  
BOSTON  
WASHINGTON, DC  
ATLANTA  
MIAMI  
NEWARK  
ALLENTOWN  
WILMINGTON  
CHERRY HILL  
HARRISBURG  
BANGOR  
PRINCETON  
PALM BEACH  
WESTCHESTER

**Re: The Chester County Hospital v. Independence Blue Cross, et al.  
Civil Action No. 02-CV-2746**

Dear Mr. Crumlish:

As we previously advised you, the Chester County Hospital has been served with a Request for Production of Documents which requires us to produce to Independence Blue Cross (IBC) the documents attached to this letter. We have previously advised you that the Court has entered a Protective Order in this case and the documents which we intend to produce have all been marked "highly confidential" in accordance with that Protective Order.

We understand that you object to the production of these documents pursuant to the Protective Order. IBC has raised this issue with the Court and we have been advised to inform you that in the event that you fail to file a motion with the United States District Court for the Eastern District of Pennsylvania by May 30, 2003, we will be required to produce the attached documents to IBC. In addition, we are redacting the small number of documents which contain not only your confidential information but also that of other insurers. We will federal express those documents to you tomorrow.

DUANE MORRIS LLP

ONE LIBERTY PLACE PHILADELPHIA, PA 19103-7396

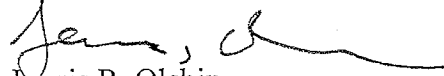
PHONE: 215.979.1000 FAX: 215.979.1020

James C. Crumlish, Esquire  
May 22, 2003  
Page 2

Accordingly, if you do not seek protection from the Court, the Chester County Hospital will have no choice concerning the release of this information. We would appreciate it if you would inform us of your decision prior to May 30, 2003.

Counsel for IBC is being sent a copy of this correspondence, but is not being provided with the enclosures.

Very truly yours,



Lewis R. Olshin

LRO:jl:PH2\732382.2

Enclosures

cc: Paul Diamond, Esquire